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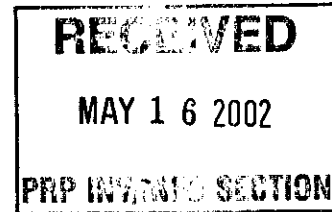
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(Red)**ARCHDIOCESE OF PHILADELPHIA****SECRETARIAT FOR TEMPORAL SERVICES**

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DEPUTY SECRETARY

May 13, 2002

Ms. Carlyn Winter Prisk (3HS11)  
United States EPA  
Region III  
1650 Arch St.  
Philadelphia, PA 19103-2029



Re: Reply by Archdiocese of Philadelphia to EPA's 104(e) Request, Lower Darby Creek  
Area Superfund Site

Dear Ms. Prisk:

The Archdiocese of Philadelphia (the "Archdiocese") hereby responds to the Information Request Letter from the United States Environmental Protection Agency ("EPA") dated November 5, 2001. The Archdiocese has diligently searched through both the Cardinal's Residence and the John W. Hallahan Catholic Girls High School (the "High School") to determine whether or not they retained documents from 1958-1976, but cannot locate any such documents, except as referenced herein. Upon information and belief these documents were long ago discarded or destroyed, but there is no record memorializing such an event. Moreover, we can locate no individuals still within our employ that have recollections of waste disposal activities that took place in 1958-1976 (the "Relevant Time Frame").

Based upon our general knowledge of these buildings and the activities that took place within them, we can only surmise that the types of wastes disposed are similar to those disposed today. In other words, there were no manufacturing or processing activities within either building. The Cardinal's Residence serves not only its primary function as the Cardinal's home, but does house some administrative offices. The High School encompasses educational facilities as well as administrative offices.

The types of waste generated at this time consist almost entirely of ordinary municipal wastes such as food wastes, and paper materials. Both facilities also dispose of small quantities of used cleaning products. The High School also lawfully disposes of a limited amount of laboratory chemicals used in its science programs, and likely did so in minute quantities during the Relevant Time Frame. There is no reason to believe that the quantities or types of these materials is in any way different from those disposed by other schools and/or administrative offices.

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The Archdiocese is unaware of any particular wastes, materials and/or waste disposal practices that would give rise to liability under CERCLA. Pursuant to the Freedom of Information Act, the Archdiocese requests any and all information within the possession and/or control of the United States Environmental Protection Agency that would indicate the types of wastes and/or waste disposal practices by the Cardinal's Residence and/or the High School during the Relevant Time Frame.

The Archdiocese more specifically responds to the EPA's Information Request as follows:

1.

(a) With respect to the Cardinal's Residence, the main occupant during the Relevant Time Frame was Cardinal John J. Krol, Archbishop of Philadelphia, now deceased. In 1958, just prior to Cardinal Krol's arrival, Archbishop John O'Hara, also deceased, occupied the Residence. Based upon our investigation, both Cardinal Krol and Archbishop O'Hara used the Residence almost exclusively as a home, and conducted very limited administrative activities at that location.

(b) With respect to the High School, the persons most likely to have information relevant to your request would be the janitor and principal of the school. During part of the Relevant Time Frame, the janitor at the High School was Mr. Art Roney, from 1975-1976. We do not know his current whereabouts. There are no records of maintenance personnel prior to 1975.

The School Principals may also have relevant information:

1958-1961 Rev. Frederick J. Frazer deceased  
1962-1964 Rev. Philip A. Scully  
1965-1970 Rev. George J. Friel deceased  
1971-1976 Rev. John F. Riley

2. Neither the High School nor the Cardinal's Residence has any documents responsive to this information request. Upon information and belief, based upon current knowledge, there were no contacts between either facility and any government authority or regulatory agency response to this inquiry.
3. There is no corresponding inquiry.
4. Neither the High School nor the Cardinal's Residence has any documents responsive to this information request. Because neither facility has any documents pertaining to any cleaning or laboratory supplies, it cannot provide the requested materials. However, upon information and belief, the waste materials from the High School would have consisted of paper and food wastes, as well as general cleaning supplies, and a small amount of laboratory waste from science programs within the school. Upon information and belief, the Cardinal's Residence would only have generated

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typical residential types of wastes such as paper, food, and a small amount of cleaning supplies. Upon information and belief, neither facility had an event that would have generated an unusual quantity or type of waste.

5. See Response to No. 4.
6. Neither the High School nor the Cardinal's Residence possesses any knowledge concerning any contractual or business relationships with the entities listed in the corresponding inquiry. Based upon our general understanding of current operations, it is likely that the High School utilized a roll-off bin to store waste materials until pick up. It is believed that the Cardinal's Residence used ordinary waste containers for regular waste pick up. The High School records date back only to 1993. Since that time Santangelo has been the waste contractor. Santangelo is owned by Onyx Waste.
7. The waste disposal arrangements for the High School would have been made through its janitor, and would likely have involved the Principal. Waste disposal arrangements for the Cardinal's Residence were made through the Institutional Procurement System ("IPS"), which ceased operations several years ago. The IPS was a stand-alone non-profit corporation formed by the Archdiocese of Philadelphia to provide procurement services for various Archdiocesan institutions. The Philadelphia Archdiocese Historic Records Center ("PAHRC"), 100 E. Wynnewood Road, Wynnewood, PA 19096, has located nearly 200 boxes of documents that relate to the IPS. These records are not indexed or organized. At the EPA's request, these documents can be made available for the EPA's review.
8. After diligent investigation, neither the High School nor the Cardinal's Residence can provide information responsive to the corresponding inquiry.
9. No.
10. These persons would be the same as those identified in Response No. 1. However, it is also likely that payment for waste disposal services at the High School were handled in the administrative office of the school, as a routine matter. The High School Principals would have been responsible for finalizing such arrangements. The two remaining principals are:

Revs. Philip A. Scully and John F. Riley

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Payment for waste disposal at the Cardinal's Residence would have been administered by the aforementioned IPS.

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11. No.
12. No information to provide.
13. (a) Andrew S. Levine, Esq., Stradley, Ronon, 2600 One Commerce Square, Philadelphia, PA 19103, (215) 564-8073; Eugene F. Brazil, Archdiocese of Philadelphia, 222 So. 17th St., Philadelphia, PA, 215-587-2453; Dr. Lorraine Rice, Ed. D., President, John W. Hallahan Catholic Girl's High School, 311 No. 19th St., Philadelphia, PA 19103, 215-563-8930; Sean Weldon, PAHRC, 100 E. Wynnewood Rd., Wynnewood, PA 19096, 610-667-2125.  
(b) Andrew S. Levine, Esq.
14. (a) The Archdiocese has no official document retention policy for contracts. The current policy only pertains to recent financial records, and would not appear relevant to this inquiry because the Relevant Time Period precedes the policy by many years.  
(b)-(d) Neither the Cardinal's Residence nor the High School have any knowledge concerning the destruction of these very old documents. It is likely that these materials included ledgers, check copies, and purchase orders that may have related to the activities at issue. Upon information and belief, many of these documents were destroyed as a matter of course as they appeared of no value. However, the PAHRC confirms there are approximately 200 boxes of documents generally related to the IPS, but there is no labeling or indexing of this material. Upon request, this information can be made available for EPA's review.

Thank you for providing us with an opportunity to respond to your questions. I trust this information is helpful.

Sincerely,



Maureen Van Thuyne  
Deputy Secretary



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2600 One Commerce Square  
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